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UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 13
	:	
Edward C. Penrose II	:	BANKRUPTCY NO.: 20-10947
	:	

RESPONSE TO THE MOTION FOR RELIEF OF THE AUTOMATIC STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. It is denied that the Debtor is delinquent as alleged in paragraph number six and a post-petition history is hereby requested for review.
7. Denied.
8. Denied.
9. Denied.
10. Denied.

WHEREFORE, based on the aforementioned, Movant shall be denied an Order Granting Relief from the Automatic Stay in the instant Bankruptcy matter.

Dated: January 17, 2022

/s/Brad J. Sadek, Esquire
Brad J. Sadek, Esquire
Sadek and Cooper
1315 Walnut Street, #804
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Philadelphia, PA 19107
(215) 545-0008
Attorney for Debtor

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

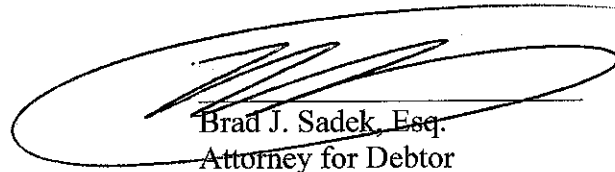
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CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below I served a true and correct copy of the Debtors' Response to the Motion for Relief on all creditors and the following parties by electronic means and/or regular US mail:

Rebecca A. Solarz, Esq.
701 Market St., Suite 5000
Philadelphia, PA 19106

Dated: January 17, 2022


Brad J. Sadek, Esq.
Attorney for Debtor